

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 22-040**

**ELECTRIC DISTRIBUTION UTILITIES**

**Consideration of Changes to the Current Net Metering Tariff Structure, Including  
Compensation of Customer-Generators**

**CPCNH STATEMENT ON HEARING TESTIMONY & EXHIBITS**

Pursuant to the Procedural Order issued by the New Hampshire Public Utilities Commission (“Commission”) on July 12, 2024, the Community Power Coalition of New Hampshire (“CPCNH”) respectfully submits this Statement on Hearing Testimony and Exhibits indicating: (1) what action or actions CPCNH will recommend the Commission take at the hearing; and (2) what exhibits and witnesses CPCNH intends to present to support each recommendation, including a brief description of what CPCNH’s witness will testify to.

CPCNH’s one witness will be Clifton C. Below. His direct (EXH 1) and rebuttal (EXH 2) testimony with attachments (Tabs 53 and 69 in the docket book) will be CPCNH’s first two exhibits. After providing any appropriate corrections or updates to his testimony he will adopt that testimony in support of the recommendations enumerated below. He will try to concisely explain the evidence and reasoning in support of each recommendation based on his pre-filed testimony and exhibits marked for identification that may be used in examination. He will review the settlement as filed and explained at hearing and indicate where CPCNH can support portions of the settlement and where we would take exception and recommend the Commission modify or condition the settlement. He will also respond to rebuttal testimony by various parties as it pertains to CPCNH’s recommendations. Subject to update in light of a filed settlement, CPCNH will recommend the following actions by the Commission:

1. Approve Reasonable “Grandfathering” Provisions. CPCNH’s proposal is summarized at EXH 1, page 9, lines 14-26 and detailed on pp. 11-12. See also EXH 2, p. 7, starting at line 12.
2. Accounting for Exports to the Grid. Answer “yes” to the question in RSA 374-F:9, XVI(a) whether “exports to the grid by customer-generators taking default service should be accounted for as reduction to what would otherwise be the wholesale load obligation of the

load serving entity providing default service, absent such exports to the grid.” EXH 1, p. 10, lines 1-7, and pp. 13-19. Direct the utilities to begin planning to update their load settlement system by competitively soliciting proposals to modify load settlement systems to account for exports to the grid by customer-generators as load reductions to the supplier’s ISO-NE load obligation, including the option of selecting one vendor to provide load settlement for all of the Joint Utilities, so that the cost of changing the load settlement system can be known. Request DOE or direct the parties to convene a stakeholder work group to flesh out requirements for updated Load Settlement that should support treatment of DERs as load reducers on a comparable basis with ISO-NE implementation of FERC Order 2222 (allowing aggregated DERs to participate in ISO-NE energy and capacity markets (and not be treated as load reducers). Qualify eligibility for NM 3.0 tariff compensation for avoided Transmission Costs on the customer-generator qualifying as a “load reducer” (not participating in the ISO-NE markets). See also EXH 2, p. 9 starting at line 8 through p. 14.

3. Compensation for Avoided Transmission Costs & Capacity Costs. For customer-generators that are greater than 1 MW (and function as load reducers) answer “yes” to the question in RSA 362-A:9, XXIII of whether monetary credit for exports to the grid “should include compensation for services and value not currently compensated including avoided transmission and capacity costs.” EXH 1, p. 10, lines 8-14. Regarding compensation for the value of avoided transmission costs see also EXH 1., pp. 19-22, and EXH 2, p. 9 starting at line 8 through p 14. For detail on compensation for avoided capacity costs to LSEs see also EXH 1, pp. 22-23. Extend credit for actual avoided transmission and capacity costs to generators > 100 kW up to 1 MW that can be equipped with hourly interval metering.
4. Excluding RPS Compliance Costs from Utility Default Service Supply Credit. Answer “yes” to the question in RSA 362-A:9, XXIII as to whether the cost of compliance with the electric Renewable Portfolio Standard (RPS), including prior period reconciliations, should be excluded from the monetary credit for exports to the grid. EXH 1, p. 10, lines 15-21. See also EXH 1, pp. 23-27, and EXH 2, pp. 4-6. Instead of using the retail default energy service rate to compensate net exports to the grid, use what Eversource and Liberty term the “Base Energy Service Rate” that is published in their filings and is the equivalent of what is paid to the supplier (with appropriate line loss adjustments), so excludes RPS, including prior period reconciliation, G&A, including cost of working capital and bad debt, and other prior

period reconciliations, none of which are values provided or avoided by the customer-generator.

5. NEM 3.0 for up to 100 kW. Continue the basic structure of NEM 2.0 for projects up to 100 kW, except apply a different credit rate for the energy supply component of compensation for net exports to the grid. EXH 1, p. 10, lines 22-26. See also EXH 1, pp. 27-28.
6. Storage. Enable energy storage to be interconnected in NEM 3.0 as a part of all new and existing NEM customer-generators that convert to NEM 3.0. This pertains to maximizing net benefits from net metering. EXH 1, p. 10, lines 22-28. See also EXH 1, pp. 28-30.
7. Implementation Issues. Stage implementation of new rate structures and business processes to ease any administrative burden on distribution utilities. As an example, initially limit NEM 3.0 rate changes to only projects > 1 MW, which are limited in number at present, may prove to be an efficient way for distribution utilities to develop the business processes needed to develop the necessary price signals. EXH 1, p. 10, line 29 to p. 11, line 3. See also EXH 1, pp. 30-31, and EXH 2, p. 6, lines 9-13, and p. 7, line 12 to p.8, line16.
8. Other Issues. Consider enabling TOU rates for net metering where practicably feasible. Don't limit "the amount of generating capacity eligible for [NM 3.0] tariffs" or impose limits on "the size of facilities eligible to receive net metering tariffs." EXH 1, p. 31-32. See also EXH 2, p. 3, starting at line 1, and p. 7, line 12 to p.8, line16.

### EXHIBITS

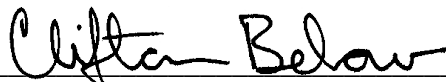
- CPCNH EXH 1 Direct Testimony of Clifton C. Below, with attachments, Tab 53
- CPCNH EXH 2 Rebuttal Testimony of Clifton C. Below, with attachments, Tab 69
- CPCNH EXH 3 DR (Data Request) EE (Eversource Energy) to CPCNH 1.2, 2/20/24, in support of Recommendation (REC) 4.
- CPCNH EXH 4 DR EE to CPCNH 1.3, 2/20/24, in support of REC 4.
- CPCNH EXH 5 DR EE to CPCNH 1.4, 2/20/24, in support of REC 4 and 5.
- CPCNH EXH 6 DR EE to CPCNH 1.5, 2/20/24, in support of REC 2.
- CPCNH EXH 7 DR EE to CPCNH 1.6, 2/20/24, in support of REC 2.
- CPCNH EXH 8 DR EE to CPCNH 1.7, 2/20/24, revised 2/22/24, in support of REC 2.
- CPCNH EXH 9 DR EE to CPCNH 1.8, 2/20/24, in support of REC 2.

- CPCNH EXH 10 DR EE to CPCNH 1.9, 2/20/24, revised 2/22/24, in support of REC 2.  
CPCNH EXH 11 DR EE to CPCNH 1.10, 2/20/24, in support of REC 2.  
CPCNH EXH 12 DR EE to CPCNH 1.11, 2/20/24, in support of REC 2.  
CPCNH EXH 13 DR EE to CPCNH 1.12, 2/20/24, in support of REC 2.  
CPCNH EXH 14 DR EE to CPCNH 1.13, 2/20/24, in support of REC 2.  
CPCNH EXH 15 DR EE to CPCNH 1.14, 2/20/24, in support of REC 2.  
CPCNH EXH 16 DR OCA to JUs (Joint Utilities) response to OCA 1-007, 10/12/23, in support of REC 4.  
CPCNH EXH 17 DR CPCNH to EE to CPCNH 2-001, 11/9/23, in support of REC 2.  
CPCNH EXH 18 DR CPCNH to Unitil to CPCNH 2-001, 11/9/23, in support of REC 2.  
CPCNH EXH 19 DR CPCNH to JUs to CPCNH 3-001, 2/20/24, in support of REC 4.  
CPCNH EXH 20 Some or all of CPCNH's Record Request Responses filed on 7/8 and 7/26 in support of one or more of the above recommendations.

CPCNH also reserves the right to make use of any other documents marked as exhibits by other parties or the Commission in this proceeding during examination, cross-examination, and/or summation. CPCNH may also ask the Commission to take administrative notice of the relevant portions of the record of other proceedings before the Commission as provided for in Puc 203.27.

Respectfully submitted,  
Community Power Coalition of New Hampshire (CPCNH)

By its Chair and witness,



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Date: August 1, 2024